

25-cv-1420

KOVNER, J  
LEVY, MJ

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Plaintiffs:

Jillbert Sadigh

I.R.P. (Minor Child, Represented by Jillbert Sadigh, Parent/Guardian)

Defendants:

- Army Intelligence – 8825 Beulah Street, Fort Belvoir, VA 22060-5246
- Central Intelligence Agency (CIA) – 1000 Colonial Farm Road, Langley, Fairfax County, VA
- Federal Aviation Administration (FAA) – 800 Independence Avenue, SW, Washington, DC 20591
- General Services Administration (GSA) – 1800 F Street NW, Washington, DC 20405
- Intelligence Knowledge Network – 111th MI Brigade, Riley Barracks, Building 51005, 2520 Healy Avenue, Fort Huachuca, AZ 85613
- Military Intelligence Corps – 1135-1323 Barnett Ave, Quantico, VA 22134
- National Security Agency (NSA) – 9800 Savage Road, Fort George G. Meade, Maryland 20755-6000
- Nuclear Regulatory Commission (NRC) – 11555 Rockville Pike, Rockville, Maryland
- United States National Science Foundation (NSF) – 2415 Eisenhower Avenue, Alexandria, Virginia 22314
- United States Army Corps of Engineers – 441 G Street NW, Washington, DC 20314-1000
- United States Army Intelligence and Security Command (INSCOM) – 8825 Beulah Street, Fort Belvoir, VA 22060-5246
- United States Army Intelligence Office of Personnel Management – 1900 E Street, NW, Washington, DC 20415

REC'D IN PROSECUTION OFFICE  
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- United States Department of Defense (DoD) – 1400 Defense Pentagon, Washington, DC 20301-1400
- Secretary of Defense – 1000 Defense Pentagon, Washington, DC 20301-1000
- Office of the Director of National Intelligence (ODNI) – 1500 Tysons McLean Dr, McLean, VA 22102
- National Reconnaissance Office (NRO) – 14675 Lee Road, Chantilly, VA 20151-1715
- United States Department of State – 2201 C Street, NW, Washington, D.C. 20520
- United States Coast Guard Intelligence – 2703 Martin Luther King Jr. Ave. SE STOP 7516, Washington, DC 20593-7516
- Federal Bureau of Investigation (FBI) – 935 Pennsylvania Avenue, NW, Washington, D.C. 20535-0001
- Office of Naval Intelligence (ONI) – 4251 Suitland Road, Suitland, Maryland 20746
- Air Force Intelligence, Surveillance, and Reconnaissance (AF ISR) – 210 Sweeney Blvd, Hampton, VA 23665
- Marine Corps Intelligence Activity (MCIA) – 2033 Barnett Avenue, Quantico, VA 22134
- Joint Chiefs of Staff – 9999 Joint Staff Pentagon, Washington, DC 20318-9999
- United States Special Operations Command (SOCOM) – 7701 Tampa Point Blvd, MacDill Air Force Base, FL 33621
- Defense Advanced Research Projects Agency (DARPA) – 675 North Randolph Street, Arlington, VA 22203-2114
- Defense Logistics Agency (DLA) – 8725 John J Kingman Rd, Fort Belvoir, VA 22060
- Defense Threat Reduction Agency (DTRA) – 8725 John J Kingman Rd, Fort Belvoir, VA 22060
- Missile Defense Agency (MDA) – 5700 18th Street, Building 245, Fort Belvoir, Virginia 22060-5573
- Defense Security Service (DSS) – 27130 Telegraph Road, Quantico, VA 22134

- Department of Homeland Security (DHS) – 2707 Martin Luther King Jr Ave SE, Washington, D.C. 20528
- Federal Emergency Management Agency (FEMA) – 500 C Street SW, Washington, DC 20472
- Customs and Border Protection (CBP) – 1300 Pennsylvania Ave NW, Washington, D.C. 20229
- Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) – 99 New York Avenue, NE, Washington, D.C. 20226
- Drug Enforcement Administration (DEA) – 8701 Morrisette Drive, Springfield, VA 22152
- Five Eyes Intelligence Alliance – 614 Hawthorn Road, Brighton, Victoria 3186, AU
- North Atlantic Treaty Organization (NATO) – Boulevard Léopold III, 1110 Brussels, Belgium
- United Nations (UN) – 760 United Nations Plaza, Manhattan, New York, NY 10017
- European Union Intelligence and Situation Centre (INTCEN) – 9A Rond Point Schuman, 1046 Brussels, Belgium
- Lockheed Martin Corporation – 6801 Rockledge Dr, Bethesda, MD 20817, United States
- Boeing Defense, Space & Security – 1000 Wilson Blvd., Arlington, VA 22209, U.S.A.
- Raytheon Technologies – 2980 Fairview Park Drive, Falls Church, VA 22042
- General Dynamics Corporation – 11011 Sunset Hills Rd, Reston, VA 20190
- Palantir Technologies – 1200 17th St, Ste 15, Denver, CO 80202, US

## COMPLAINT

Plaintiff, Jillbert Sadigh, individually and on behalf of her minor child, I.R.P., brings this action against the above-listed Defendants and alleges as follows:

## I. INTRODUCTION

1. This lawsuit is filed to hold the Defendants accountable for their unlawful actions and violations of federal law that have caused harm to the Plaintiffs.
2. The Defendants have violated and broken the laws of the United States of America by engaging in unlawful surveillance, intelligence operations, misconduct, negligence, and violations of constitutional and human rights.
3. These violations have caused significant harm to Plaintiffs, including but not limited to emotional distress, invasion of privacy, and infringement upon their fundamental rights.
4. Our lives have been in danger because of them.
5. The Defendants are all affiliated with the U.S. Army, the U.S. Military, the U.S. Navy, the U.S. Air Force, the U.S. Space Force, the United States Special Operations Forces, and other military and intelligence agencies.
6. Plaintiff seeks justice for the unlawful actions of Defendants and requests immediate intervention from this Court.

## II. JURISDICTION AND VENUE

7. This Court has jurisdiction under 28 U.S.C. § 1331 (Federal Question Jurisdiction) and 42 U.S.C. § 1983 (Civil Rights Violations) as the claims involve violations of constitutional rights, federal statutes, and illegal government conduct.
8. Venue is proper in the Eastern District of New York pursuant to 28 U.S.C. § 1391(b) as the unlawful acts committed by the Defendants have directly impacted the Plaintiffs within this jurisdiction.

## III. FACTUAL ALLEGATIONS

9. The Defendants, acting individually and in coordination, have:
  - Conducted unlawful surveillance on the Plaintiffs, violating their Fourth Amendment rights.
  - Collected and shared personal information without authorization.
  - Engaged in misconduct, negligence, and intelligence abuse.
  - Violated constitutional protections by unlawfully targeting and harming the Plaintiffs.
  - Failed to adhere to legal obligations under U.S. law.
10. Special materialized equipment has been used around my daughter and me, and weapons have been and/or are or were involved around my daughter and me.

11. These unlawful acts have directly harmed the Plaintiffs, causing emotional distress, privacy invasion, and potential long-term consequences.

#### IV. CAUSES OF ACTION

##### COUNT I – VIOLATION OF CONSTITUTIONAL RIGHTS

12. The Defendants have violated the First, Fourth, Fifth, and Fourteenth Amendments of the U.S. Constitution through unlawful surveillance, denial of due process, and violations of privacy rights.

##### COUNT II – NEGLIGENCE AND FAILURE TO PROTECT

13. The Defendants had a legal duty to act in accordance with the law but failed to uphold their responsibilities, causing harm to Plaintiffs.

##### COUNT III – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

14. The Defendants engaged in extreme and outrageous conduct that resulted in severe emotional distress for Plaintiffs.

##### COUNT IV – VIOLATION OF FEDERAL LAWS

15. The Defendants violated multiple federal statutes, including but not limited to:

- The Privacy Act of 1974 (5 U.S.C. § 552a) – Defendants improperly collected and disseminated personal information.
- The Civil Rights Act (42 U.S.C. § 1983) – Defendants acted under government authority to violate Plaintiffs' civil rights.
- The Electronic Communications Privacy Act (18 U.S.C. § 2510-2523) – Defendants engaged in unlawful surveillance.

#### VI. JURY DEMAND

Plaintiffs demand a trial by jury on all issues so triable.

Dated: March 7, 2025

Respectfully submitted,

Jillbert Sadigh

Phone: 646-799-8633

Email: jillsadigh1@yahoo.com

83-60 118th St, Apt 4B

New York, NY 11415

Jill Sadigh